EXHIBIT 11

EDWARD HOFFMAN, PH.D.

Clinical Psychologist
19 West 34th Street, Penthouse Suite
New York, New York 10001
Phone: (212) 947-7111   Fax: (212) 239-0948

PSYCHOLOGICAL REPORT

Name: Aundreya Teed
DOB: 5/29/09
DOE: 6/21/21
Age at Evaluation: 12 years, 0 months
Date of Report: 7/6/21

REFERRAL AND BACKGROUND INFORMATION:

Aundreya Teed was referred for a psychological evaluation, in order to determine her current strengths and weaknesses pertaining to her lead exposure. Aundreya and her family were somewhat familiar to this examiner at the time of the evaluation. In May 2020, this examiner reviewed school and medical records; additionally, Aundreya's mother was interviewed by phone and administered several parent-oriented standardized measures concerning Aundreya's adaptive, attentional, and emotional-behavioral functioning.

According to Aundreya's mother in her deposition dated 1/14/20, Aundreya is a fraternal twin and is the product of a full-term pregnancy culminating in a C-section delivery without complications at Genesys Regional Medical Center in Grand Blanc, Michigan. Her mother denied smoking cigarettes, being injured, or engaging in substance abuse during the pregnancy. Aundreya was reportedly born a healthy infant and was discharged to her home several days after birth; there had been no medical complications during this period such as irregular heartbeat. During Aundreya's early development, she reportedly achieved normal developmental milestones.

Aundreya had the following elevated lead level on 1/12/16: <3.3

Approximately two weeks after birth, Aundreya relocated with her mother and four siblings to Montana; these family members returned to Michigan about a year later.

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During kindergarten in the 2014-2015 school year at Freeman
Elementary School, Aundreya achieved a "1"/"Poor"), the lowest
score possible, for her yearly behavior.
As commented by her teacher on the report card:
  -- "Aundreya has trouble listening during class sometimes and
     will be confrontational with other students sometimes as
     well."
  --"She is working on following directions the first time they
     are given and listening when the teacher is talking."
  --"Sometimes we need to remind her about her space/our space
     and behavior towards her peers."
  --Aundreya still needs to work on following directions the
     first time they are given and being respectful to
     classmates."

Although Aundreya achieved the rating of "S/Satisfactory" in all
academic areas in her yearly rating, her classroom teacher
nevertheless recommended summer school attendance due to the
severity of Aundreya's "social and academic skill" difficulties.
For example, Aundreya attained the grade of "N/Needs
Improvement" twice in Social Studies marking periods and once in
Math, Reading Overall, and Writing Overall marking periods.

During the 2015-2016 school year, Aundreya attended the first
grade at the Grand Blanc Academy and showed improved academic
ability. However, for two of the four marking-periods, her
teacher noted Aundreya's behavior of "blurting out" in class.

During 2016-2017 school year, Aundreya attended the second
grade at the Grand Blanc Academy. Her teacher noted behavioral
difficulties in the "Comments" section of the report card. In
addition, Aundreya failed to achieve a satisfactory rating in
many areas of Study Habits and Social Development for the final
marking-period. These included "Listens and follows directions,"
"Respects authority/accepts correction, "Takes responsibility
for own acts, and "Respects peers and adults." Her final marking
period grades in both Reading and Math sub-areas were "Expected
Progress" and "Strength."

Aundreya revealed continued academic difficulties in the third
grade during the 2017-2018 school year. In Math, her marking-
period grades were D+, D+,C+, and B. In Reading, her marking-
period grades were C+, C+, B+, and A-. In Social Studies, her
marking-period grades were C, A-, A, and B. In Science, her
marking-period grades were 3Bs, followed by an A-. In the spring
of 2018, Aundreya was administered standardized tests in ELA

2

and Math respectively: She scored only "Partially Proficient" in ELA and "Proficient" in Math.

Aundreya attended GBA Elementary School for the fourth grade, where she continued to struggle academically. In Math, Aundreya's marking-period grades included F, D-, and D+, with a final marking-period grade of B. In Science, Aundreya's grades included D, D+, and A, with a final marking-period grade of B. Aundreya will be entering the sixth grade this coming fall.

Aundreya attended the fifth grade in the Bendle Public Schools during the 2019-202 school year. Due to the COVID-19 pandemic lockdown, she did not attend school in person from March through June of that school year. On her first three marking periods, she showed considerable improvement compared to fifth grade with all grades at least B+ or 2 ("developing skills as expected") except for a C in Physical Health.

In her deposition, Aundreya's mother related that Aundreya exhibited significant attentional problems as well as reading difficulties upon entering the Grand Blanc school system, and that her focusing ability and classroom behavior noticeably worsened during the period when the Flint water system was altered until it was switched back to Detroit's; these problems have persisted.

For example, Aundreya's mother stated, "She has a hard time focusing. She's disruptive sometimes or distracting to the rest of the class" (p.52). Her mother also reported that Aundreya has difficulty in completing assignments, exhibits a low frustration tolerance and has difficulty in interacting with classmates adequately on group assignments. In addition, Aundreya has displayed continuing passivity and social withdrawal. For example, her mother stated, "She's a lot less active now. In her spare time, she just likes to sit on her bed or sit in her room or sit on the couch…not be social. Her demeanor in that way changed for sure (p.139)." Aundreya's mother also reported that Aundreya has displayed persistent fatigue (p.153), loss of interest in new activities and new places (p.187), daydreaming (p.205), and lower self-expectations (p.142). Aundreya's mother also reported that Aundreya has lower expectations for herself, and therefore, her mother has considered psychotherapy for Aundreya.

As interviewed by this examiner in May 2020, Aundreya's mother recounted that Aundreya was residing at home with her mother and four siblings, Seth, Dominic, Serenity and Gage. At the time, Aundreya was having face-to-face contact with her father

3

approximately once per month. Aundreya's mother indicated at the time that Aundreya had no health problems and was taking no medication on a regular basis.

As interviewed by this examiner on 6/21/21, Aundreya's mother reported that Aundreya was sleeping soundly at night and she denied frequent nightmares. Her appetite was reportedly normal.

CLINICAL INTERVIEW:

As interviewed by this examiner on 6/21/21, Aundreya related that she attended school in person rather than on "Zoom" during the past school year. She recounted having friends in school but not in her neighborhood. She liked her teachers during the past school year. Aundreya's favorite subjects were math and gym. She disliked social studies and language arts. Aundreya denied that anything bothered or got her mad at school. She has no vocational goals at the present time. Aundreya enjoys doing jigsaw puzzles and watching TV as her favorite leisure activities.

ASSESSMENT PROCEDURES:

Comprehensive Trail-Making Test-2 (CTMT-2)
WISC-V
Woodcock-Johnson Tests of Achievement IV
Receptive One-Word Picture Vocabulary Test (ROWPVT)
Beery VMI-6th edition
Symbol Digit Modalities Test
Benton Visual Retention Test
Clinical Interview
Parent Interview

BEHAVIORAL OBSERVATIONS:

Aundreya presented as a tall, pleasant, twelve-year old girl with blond hair and blue eyes. She was right-handed. Aundreya was neatly attired and groomed. Aundreya required occasional reminders from this examiner to focus her attention. She responded well to praise and encouragement.

EXECUTIVE FUNCTIONING:

4

On the Comprehensive Trail-Making Test-2, Aundreya showed a deficit in executive functioning involving the grapho-motor domain independent of memory. On the five trails, her T scores ranged from 38 through 47, with corresponding percentiles that ranged from 12% to 38% for her age range. Aundreya attained a CTMT Composite Index of 204, yielding a standard score of 85 and placing her at the bottom 15% for her age range. This performance indicated a deficiency in this domain involving timed tasks. Individuals functioning at this level of deficiency typically experience difficulties in utilizing working memory effectively during new cognitive tasks under time constraint.

COGNITIVE FUNCTIONING:

WISC V

Verbal Comprehension Index	Standard Score	Percentile
Similarities	12	75%
Vocabulary	11	63%
(Comprehension)	11	63%
(Information)	8	25%

Visual Spatial Index		
Block Design	8	16%
Visual Puzzles	14	75%

Fluid Reasoning Index		
Matrix Reasoning	9	37%
Figure Weights	10	50%
(Picture Concepts)	6	09%
(Arithmetic)	10	50%

Working Memory Index		
Digit Span	12	75%
Picture Span	6	09%

Processing Speed Index		
Coding	9	37%

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Symbol Search                                16              98%
(Cancellation)                               14              91%

Verbal Comprehension Index=108       70%
Visual Spatial Index=105             63%
Fluid Reasoning Index=97             42%
Working Memory Index=94              34%
Processing Speed Index=114          82%
Full Scale IQ=101                    53%
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On the WISC-V, Aundreya displayed a statistically significant, 20-point deficit in her functioning within the Working Memory domain compared with her much higher functioning in the Processing Speed domain. As indicated by Table B5 of the WISC-V manual, this discrepancy is at the .01 level of probability for children of her age.

Aundreya also exhibited a statistically significant, 17-point deficit in her functioning within the Working Memory domain compared with her much higher functioning in the Processing Speed domain. As indicated by Table B5 of the WISC-V manual, this discrepancy is at the .05 level of probability for children of her age.

Aundreya also exhibited clinically significant intra-test scatter on several subtests of the WISC-IV. Such a pattern is typically associated with a difficulty in sustaining attention during new cognitive tasks. In the absence of such intra-test scatter, Aundreya would have scored at the 99.9% for her age in Visual Puzzles, at the 99% for her age in Similarities, at the 98% for her age in Comprehension, and at the 75% for her age in Vocabulary.

Aundreya also showed a very large amount of inter-test scatter on the WISC-V, with scaled scores ranging from 6 to 16. This pattern is typically associated with the presence of a learning disability.

On the Receptive One-Word Picture Vocabulary Test (ROWPVT), Aundreya attained a standard score of 101, placing her at the 53rd percentile for her age and corresponding to an age equivalent of 12 years, 1 month. It is important to note that Aundreya displayed a large amount of intra-test scatter, indicating a difficulty in sustaining her attention during this test involving receptive vocabulary. In the absence of this scatter, Aundreya's standard score would have risen to 114, placing her at the 83% for her age and corresponding to an age equivalent of 14 years, 6 months.

VISUAL-PERCEPTUAL FUNCTIONING:

On the Beery, Aundreya attained an age-equivalent of 15 years, 5 months and a corresponding standard score of 105. This score placed her at the 63rd percentile for her age in the grapho-motor domain. Aundreya held her pencil with an adequate grip. There was a moderate amount of intra-subtest scatter on this test, and therefore, evidence for a higher capability in the grapho-motor domain. In the absence of scatter, Aundreya's age-equivalent score would have risen three years to 18 years, 5 months. Her corresponding standard score would have been elevated to 112, placing her at the 79th percentile for her age.

On the Symbol Digit Modalities Test, Aundreya answered 45 items correctly, scoring within the mean range for girls of her age. Aundreya did not produce any scorable errors. These results are consistent with her performance on the comparable Coding subtest of the WISC-V.

On the Benton Visual Retention Test, Aundreya accurately copied all of the 10 visual stimuli correctly when placed directly before her. This score was slightly above the average range for children of Aundreya's age and corresponded to an IQ range of 116 through 147. It is also consistent with her performance on the Beery.

When Aundreya was required immediately to copy comparable visual stimuli when removed from her vision following a 10-second presentation for each stimulus, she copied 8 correctly. For children twelve years old, this performance corresponds to an estimated IQ score of 105 and above. Thus, there is no evidence for a significant deficit in her short-term visual memory involving the grapho-motor domain.

ACADEMIC FUNCTIONING: (ranked by standard score)

Woodcock-Johnson Subtest	S.S.	Grade Equiv.	Percentile
Sentence Reading Fluency	105	8.5	64
Letter-Word Identification	102	7.6	54
Spelling	102	7.4	56
Sentence Writing Fluency	100	7.0	50
Science	90	4.4	25
Math Facts Fluency	89	5.1	24
Calculation	88	5.0	20
Passage Comprehension	87	4.3	19

Humanities	87	4.2	20
Social Studies	77	3.0	06

Due to the fact that Aundreya starts seventh grade this coming fall, these standardized test scores indicate that she is functioning more than two-and-a-half year below grade-level in reading comprehension and fully two years below grade-level in complex arithmetic calculations. In addition, Aundreya is functioning more than two-and-a-half years below grade-level in her Humanities knowledge and Science knowledge, and fully four years below grade-level in her Social Studies knowledge.

It should be noted that Aundreya showed considerably better functioning in both her reading decoding and ability to read short sentences for meaning under time constraint compared to her reading comprehension for passages. This performance indicates a deficiency in understanding more complex forms of reading.

It is also important to note that Aundreya displayed a large amount of intra-test scatter on the Woodcock-Johnson subtests, revealing a difficulty in cognition involving previous learning. In the absence of such scatter, Aundreya would have achieved the following subtest scores:

Woodcock-Johnson Subtest   S.S.   Grade Equivalent Percentile
(Absence of intra-test scatter)

Spelling	116	13.0	85%
Science	109	11.7	72%
Humanities	107	9.3	68%
Passage Comprehension	106	8.6	65%
Letter-Word Identification	105	8.2	62%
Calculation	95	6.1	37%
Social Studies	81	3.5	11%

These scores indicate that Aundreya's score in spelling would have risen to the Grade 13.0 level. Her scores in reading decoding and reading comprehension would have risen to Grade 8.2 and Grade 8.6 respectively; her score in complex arithmetic calculation would have risen to Grade 6.1. In terms of subtests measuring academic knowledge, Aundreya's scores would have risen considerably in both Humanities and Science, indicating a significant cognitive deficiency in retrieving academic information that has already been learned. Aundreya showed a mild increase in her Social Studies knowledge in the absence of intra-test scatter.

8

ADAPTIVE FUNCTIONING:

In May 2020, Aundreya's mother was administered the Vinleand-3 by phone. She appeared to be a reliable and accurate informant. There was no indication that she was attempting to inflate or minimize Aundreya's abilities. Aundreya evidenced adequate ability for her age in the Communication domain, Daily Living Skills domain, and the Socialization domain. As reported by her mother in July 2021, Aundreya continues to show adequate functioning in her adaptive skills.

ATTENTIONAL-BEHAVIORAL FUNCTIONING:

In May 2020, Aundreya's mother was administered the Delis Rating of Executive Functions (D-REF) and likewise appeared to be a reliable and accurate informant. Based on her information concerning Aundreya's behaviors for the previous six months, a computer-generated analysis indicated a clinically significant elevation in the Core area of Emotional Functioning. Aundreya attained a T-score of 65, placing her at the 93rd percentile. Aundreya's Total Composite yielded a T-score of 56, placing her at the 73rd percentile rank for her age.

Aundreya's elevated score in Emotional Functioning shows that she has significant difficulties compared to peers in emotion regulation, such as poor frustration tolerance, lability, poor anger management, and noncompliance. She may also have difficulties related to inattention and distractibility.

In addition, Aundreya displayed statistically significant discrepancies in two Core Index comparisons: Emotional Functioning vs. Behavioral Functioning and Emotional Functioning vs. Executive Functioning. These discrepancies are associated with symptoms of lability, poor frustration tolerance, and poor anger control as well as inattention and poor self-monitoring.

On the Conners 3-Parent, which focuses on children's functioning within the past month, Aundreya's mother in May 2021 appeared to be a reliable and accurate informant. Indeed, on the Inconsistency Index, Positive Impression Scale, and Negative Impression Scale, her mother's scores showed no significant inconsistency in her responses and no significant indication of attempting to inflate or minimize Aundreya's functioning.

On the Conners 3-Parent, Aundreya showed a very high elevation compared to girls her age on the Conners 3 Global Index Total

9

(T-score=85). She also showed a high elevation on the DSM-5 ADHD Inattentive scale (T=68). In addition, Aundreya attained a Conners 3 ADHD Index of 77% probability. Her mother reported that Aundreya displays these negative behaviors very frequently:
- Worries about many things;
- Does not understand what she reads;
- Fidgeting;
- Temper outbursts;
- Disturbs other children;
- Is easily distracted by sights or sounds.

In contrast, Aundreya did not show significant elevations for girls her age on such scales as Learning Problems, Conduct Disorder, DSM-5 Oppositional Defiant Disorder, Defiance/Aggression, or Peer Relations.

SUMMARY AND CONCLUSIONS:

In summary, Aundreya Teed is a 12-year-old girl with a history of lead poisoning, and sustained attentional, cognitive, and learning deficits. On the Comprehensive Trail-Making Test-2, Aundreya showed a deficit in executive functioning involving the grapho-motor domain independent of memory. Aundreya attained a standard score of 85 and placing her at the bottom 15% for her age range. Individuals functioning at this level of deficiency typically experience difficulties in utilizing working memory effectively during new cognitive tasks under time constraint.

On the WISC-V, Aundreya displayed a statistically significant, 20-point deficit in her functioning within the Working Memory domain compared with her much higher functioning in the Processing Speed domain. Aundreya also exhibited a statistically significant, 17-point deficit in her functioning within the Fluid Reasoning domain compared with her much higher functioning in the Processing Speed domain. As indicated by Table B5 of the WISC-V manual, this discrepancy is at the .05 level of probability for children of her age.

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Due to the fact that Aundreya starts seventh grade this coming fall, her standardized test scores on the Woodcock-Johnson IV indicate that she is functioning more than two-and-a-half year below grade-level in reading comprehension and fully two years below grade-level in performing complex arithmetic calculations. In addition, Aundreya is functioning more than two-and-a-half years below grade-level in her Humanities knowledge and Science knowledge, and fully four years below grade-level in her Social Studies knowledge.

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11

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On the Delis Rating of Executive Functions (D-REF) with her mother as informant in May 2020, Aundreya revealed indicated a clinically significant elevation in the Core area of Emotional Functioning. This score shows that she has significant difficulties compared to peers in emotion regulation, such as poor frustration tolerance, lability, poor anger management, and noncompliance. She may also have difficulties related to inattention and distractibility. In addition, Aundreya displayed statistically significant discrepancies in Emotional Functioning vs. Behavioral Functioning and Emotional Functioning vs. Executive Functioning. These discrepancies are associated with symptoms of lability, poor frustration tolerance, and poor anger control as well as inattention and poor self-monitoring.

On the Conners 3-Parent with mother as informant, Aundreya showed a very high elevation compared to girls her age on the Conners 3 Global Index Total. She also showed a high elevation on the DSM-5 ADHD Inattentive scale. In addition, Aundreya attained a Conners 3 ADHD Index of 77% probability.

Based on my evaluation and review of records provided, Aundreya's specific attentional and cognitive deficits are a major cause in producing her learning impairments. Due to Aundreya's chronological age, these impairments are highly likely to be permanent in nature.

These impairments have already impacted adversely upon Aundreya's proficiency in reading comprehension, performing complex calculations under time constraint, and science, social studies, and humanities knowledge. As academic demands increase with entry into higher grades, Aundreya's deficits will increasingly impact negatively upon her scholastic proficiency.

Specifically, Aundreya shows the ability to complete a two-year community college program. However, in the absence of her

attentional, cognitive, and learning deficits, Aundreya would
have been able to graduate from a four-year-college and then
continue to complete a graduate or professional school. She
would then have been able to attain employment commensurate with
such advanced education.

Edward Hoffman Ph. D

Edward Hoffman, Ph.D.
Michigan, New York State, and New Jersey Licensed
 Psychologist

13